

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOSEPH SEBASTIAN MODLA, JR.	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
JOSEPH SEBASTIAN MODLA, JR.	:	
Respondent	:	CASE NO. 5-24-bk-00039

TRUSTEE’S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 22nd day of April, 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor’s plan for the following reason(s):

1. The Trustee avers that debtor(s)’ plan is not feasible based upon the following:

- a. Plan ambiguous – Base amount. More specifically, February 2024 to May 2026 equals 28 months x \$335.00 equals \$9,380.00 not \$6,300.00 as stated in the plan.

WHEREFORE, Trustee alleges and avers that debtor’s plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/Agatha R. McHale  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 22nd day of April, 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Jason Provinzano, Esquire  
16 W. Northampton Street  
Wilkes Barre, PA 18701

/s/Deborah A. DePalma  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee